

## STATEMENT IN SUPPORT OF PROBABLE CAUSE

IN RE: **Pedro Alejandro Rodriguez**

I, Carlos A Montemayor, Task Force Officer, declare and state as follows:

1. On June 17, 2024, Border Patrol Agents were assigned to the Texas State Highway 359 immigration checkpoint located just west of Bruni, Texas, in Webb County. At approximately 1:40 p.m. a dark gray Ford Escape approached the primary inspection area. Border Patrol Agent (BPA) proceeded to conduct an immigration inspection on the occupant of the vehicle.

2. The driver, later identified as RODRIGUEZ, Pedro Alejandro, rolled the front and rear driver's side windows down as he approached the primary inspection area. As RODRIGUEZ came to a stop, BPAs noticed an overwhelming odor of air fresheners coming from the dark gray Ford Escape. RODRIGUEZ was also prominently displaying a Juvenile Probation Officer Badge hanging around a chain on his neck. Additionally, RODRIGUEZ had a "back the blue" law enforcement sticker displayed on the back of the dark gray Ford Escape.

3. When asked about the Juvenile Probation Officer Badge around his neck, RODRIGUEZ stated that he was a Juvenile Probation Officer from Hidalgo, Texas. RODRIGUEZ stated he was coming from a training in Laredo, Texas. While the primary BPA was talking with RODRIGUEZ, the assigned canine BPA was advising that his assigned service canine had alerted to the rear of the vehicle.

4. RODRIGUEZ was asked if he could grant consent to open the back hatch and look inside to which he stated yes and unlocked the back door. Once the back door was opened the canine BPA advised that he could see what appeared to be a human shape concealed under a black sheet in the back cargo area of the dark gray Ford Escape.

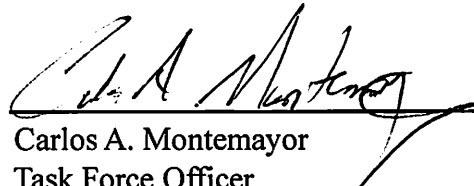
5. RODRIGUEZ was asked to exit the dark gray Ford Escape and was detained by placing him in handcuffs. BPAs moved the sheet and confirmed that there was a person, later identified as RODRIGUEZ-Maldonado, David Edgardo, concealed beneath the sheet. An immigration inspection revealed that RODRIGUEZ-Maldonado was an undocumented noncitizen (UNC).

6. Homeland Security Investigations (HSI) Task Force Officers (TFO) were able to identify one material witness: David Edgardo RODRIGUEZ-Maldonado. RODRIGUEZ-Maldonado stated he is a citizen of Honduras, and he is illegally present inside the United States. RODRIGUEZ-Maldonado stated he illegally entered the United States by way of Mexico by crossing the Rio Grande River by raft. RODRIGUEZ-Maldonado stated his

sister made arrangements and was helping him out to pay in order to have him transported to the interior of the United States. RODRIGUEZ-Maldonado stated that he crossed the river on June 16, 2024, and walked about four hours before he was picked up by the green in color pickup. RODRIGUEZ-Maldonado stated that he stayed for one day at unknown house before he was pick up by red in color small Sport Utility Vehicle (SUV). RODRIGUEZ-Maldonado also stated he believed he was in the city if McAllen due to the large amount of references that were given by the driver of the red in color small SUV. RODRIGUEZ- Maldonado stated he was then transferred to a gray in color SUV. RODRIGUEZ-Maldonado stated that he was in the gray SUV for about an hour before he was arrested at the immigration check point. RODRIGUEZ-Maldonado was unable to identify the driver of the gray in color SUV via sixpack photo lineup.

7. When HSI TFOs attempted to interview RODRIGUEZ, the driver of the grey Ford, RODRIGUEZ requested an attorney to be present.

I declare (certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on the 18th day of June, 2024.

  
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Carlos A. Montemayor  
Task Force Officer  
Homeland Security Investigations

Having reviewed the foregoing declaration, I find probable cause that the defendant(s) named above committed an offense against the laws of the United States and may therefore be further detained pending presentment before a judicial officer.

Executed on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE